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**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554

**EB Docket No. 06-36**

**Re: CERTIFICATION OF CPNI COMPLIANCE FILING – January 21, 2009**

Peninsula Telephone Company

499 Filer ID # 814649

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Duncan', is written over a light blue horizontal line.

Scott Duncan  
JSI Staff Director-Regulatory Affairs  
[sduncan@jsitel.com](mailto:sduncan@jsitel.com)

Attachment

cc: Best Copy and Printing, Inc. *via email to [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)*

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4625 Alexander Drive, Suite 135  
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Fax: 770-410-1608

**Peninsula Telephone Company**

14909 Peninsula Drive, Traverse City, MI 49686

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification****EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Date signed: January 16, 2009

Name of Company Covered by this Certification:499 Filer ID

Peninsula Telephone Company

814649

Name of signatory: Jack E. Solomonson

Title of signatory: President

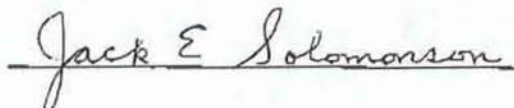
I, Jack E. Solomonson, certify that I am an officer of the company named above ("Company"), and acting as an agent of the Company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company did not take any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2008. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company did not receive any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with Commission rules.



Attachment

**Peninsula Telephone Company**  
**14909 Peninsula Drive, Traverse City, MI 49686**

**499 Filer ID 814649**

**2008 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE**  
**January 16, 2008**

This statement accompanies the Company's 2008 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. *See* 47 C.F.R. § 64.2001 *et seq.*

*All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.*

**1. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

**2. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

**3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

**4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

**5. Customer Notification and Authorization Process**

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008. The Company has complied with the notice requirements for Opt-Out. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

**6. Record of Customer CPNI Approval/Non-Approval**

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

**7. Procedures Protecting Against Disclosure of CPNI**

The Company has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:\*

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company does not provide customers with on-line access to customer account information.

The Company has implemented procedures to notify customers of account changes.

\*The Company does not provide customers with on-line access to customer account information.

**8. Actions Taken Against Data Brokers and Responses to Customer Complaints**

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

<u>Not applicable.</u>	No actions taken against data-brokers.
	No customer complaints received.

**9. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

**10. Supervisory Review Process for Outbound Marketing**

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

**11. Procedures for Notifying Law Enforcement of CPNI Security Breaches**

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.